

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Schools and Libraries)	CC Docket No. 02-6
Universal Service Support Mechanism)	
)	
Request for Review and/or Waiver)	
By El Monte Union High School District)	Application No. 819756
Universal Service Administrative Company)	

**CONSOLIDATED REQUEST FOR REVIEW AND/OR WAIVER
BY THE EL MONTE UNION HIGH SCHOOL DISTRICT
OF A FUNDING DECISION BY THE
UNIVERSAL SERVICE ADMINISTRATIVE COMPANY**

Pursuant to sections 54.719 and 54.722 of the Commission's rules,¹ the El Monte Union High School District (El Monte) hereby respectfully requests a review of a Universal Service Administrative Company (USAC) decision to deny an implementation extension request that El Monte submitted to complete its internal connections project, pursuant to section 54.507(d) of the Commission's rules.² For the reasons set forth below, the Wireline Competition Bureau (Bureau) should grant this appeal, and/or any waivers necessary or warranted, and remand the above-captioned application to USAC for immediate approval.

¹ 47 C.F.R. § 54.719(b), (c); 47 C.F.R. § 54.722(a).

² 47 C.F.R. § 54.507(d). USAC's appeal denial letter is attached as Exhibit 1.

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EXECUTIVE SUMMARY

El Monte requested funding for internal connections for funding year 2011, received its funding commitment very late in the funding year, and then needed extra time to complete the installation of its internal connections, due primarily to the untimely death of its director of technology before the installation was completed. Without a technology director, El Monte was unable to convey its specific needs to its service provider, Alquest, in a timely fashion. El Monte has requested three service implementation extensions, and USAC granted those extension requests until the final one El Monte submitted a year ago in order to complete its ongoing internal wiring infrastructure project.

Six months after El Monte's request was submitted, USAC denied El Monte's service implementation extension request for the above-captioned application. El Monte appealed that decision in May, and on September 1, 2016, USAC denied El Monte's appeal. In its denial, USAC stated that El Monte had failed to satisfy the Commission's criteria for granting service implementation extensions because the "reasons provided by the applicant were situations that were in their control and therefore cannot be considered as valid reasons for delay."³

El Monte now asks the Bureau to reverse USAC's denial on the ground that USAC misapplied the Commission's rule governing service implementation extensions. Specifically, section 54.507(d)(4)(iii) of the Commission's rules provides that an applicant may obtain an implementation extension from USAC if "[t]he applicant's service provider is unable to complete implementation for reasons beyond the *service provider's* control."⁴ In this case, the reason for delay was the applicant's staffing and administrative challenges and was indeed

³ USAC Denial at 2.

⁴ 47 C.F.R. § 54.507(d)(4)(iii).

completely beyond the service provider's control. The service provider stood ready and willing to complete the project. USAC's decision cited the Commission's 2001 order adopting this rule for the proposition that the reason for delay must be beyond the *applicant's* control, but neither that order nor the rule itself says that, and El Monte is aware of no Commission order interpreting the rule in that manner. The Bureau has previously granted appeals of service implementation extension denials for reasons that were beyond the service provider's control but within the applicant's control, even where – unlike here – the extension request was filed late.

El Monte's extension request thus satisfied the criteria in the Commission's rules and should have been granted. USAC granted its previous requests submitted for the same reason as the most recent one. However, El Monte respectfully requests in the alternative that the Bureau waive section 54.507(d) to the extent that the Bureau finds it necessary to grant the requested relief. El Monte does not know why USAC denied its latest extension request after having previously granted extension requests for the same funding year with no suggestion that they did not satisfy the criteria in the Commission's rules. However, El Monte and Alquest still wish to complete the installation under the terms of their original contract, have already made great progress toward completion of the work, and are poised to complete it within a year after an extension is granted. Both El Monte and Alquest believe that completing the work pursuant to their original agreement is the most efficient use of the school district's resources. Accordingly, granting this appeal is in the public interest.

I. BACKGROUND

Located in the heart of the San Gabriel Valley, the El Monte Union High School District was established in 1901. El Monte employs more than 1,200 teachers and staff. The professional staff provides educational programs for more than 9,000 students in grades 9 through 12. The families who live in this area include many in the middle to lower income economic groups. The El Monte philosophy of education calls for the school, the home, and the community to work cooperatively toward the achievement of its educational goals.

El Monte was awarded approximately \$1.5 million for internal connections on April 11, 2012 for the above-captioned application with Alquest Technologies, Inc., selected as the service provider. Shortly thereafter, El Monte's director of technology, Garrett McKay, died unexpectedly. Mr. McKay's untimely death threw El Monte's technology department into a state of uncertainty. Having limited options at the time, El Monte appointed an assistant in the technology department as the interim director. The assistant unfortunately was unable to put together the initial scope of what was needed to expand and repair internal connections within the school district's buildings and could not provide directions to Alquest. Without direction from El Monte regarding the scope of work, there was little that Alquest could do. When it became apparent that Alquest would miss the installation deadline in 2013, through no fault of its own, El Monte filed a service implementation extension request pursuant to section 54.507(d), which USAC granted.

At the same time, El Monte experienced an extraordinary level of turnover in various leadership roles, which further limited its ability to hire a new technology director. Since 2011, El Monte has had four superintendents, four chief budget officers, three fiscal directors, three directors of purchasing, and two directors of maintenance and operations. Amidst this personnel turmoil, El Monte was unable to provide additional support to the interim director of technology,

so over the next few years Alquest received no additional instruction from El Monte and thus remained unable to make progress on the work. El Monte experienced financial setbacks during this time as well. Specifically, due to the turnover of chief business officers and superintendents, El Monte's Bond Oversight Committee was not meeting regularly. As a result, the school district was unable to fund Alquest's work in 2013 and 2014. El Monte requested and was granted a service implementation extension for an additional year – through the end of funding year 2015.

In August 2014, El Monte hired Erick Steelman as its new director of information services. Shortly after his arrival, Mr. Steelman began to put together a scope of work for Alquest to complete the internal connections work previously approved by USAC. With Mr. Steelman on board, El Monte finally had the personnel who were capable of working with Alquest to complete the work it had originally enlisted Alquest to perform. Mr. Steelman developed a plan to buy access points for every classroom, along with additional switches and optics to support the added ports, and to install two jacks in every district classroom. Alquest has so far performed about half of the wiring work, but additional infrastructure upgrades are necessary to allow the district to fully meet its broadband needs.

In spite of having made significant progress, El Monte and Alquest determined that they would require one more service implementation extension in order to complete the work, so in September 2015 El Monte filed an extension request with USAC. To El Monte's surprise, USAC denied this request six months later, in March 2016, asserting that El Monte had filed the request after the deadline had passed.⁵ El Monte appealed this conclusion in May, proving that it had in fact filed the extension request on time. On September 1, 2016, USAC partially granted

⁵ See Exhibit 2, Administrator's Decision on Implementation Extension Request, dated March 31, 2016.

the appeal, concluding that the extension request had indeed been filed on time, but surprised El Monte again by nonetheless denying the appeal because it allegedly failed to satisfy the requirements in the Commission's rules.⁶ El Monte herein timely files its request for review and/or waiver with the Commission.⁷

II. EL MONTE'S EXTENSION REQUEST SATISFIED THE CRITERIA IN THE COMMISSION'S RULES

In its denial, USAC stated that El Monte had failed to satisfy the Commission's criteria for granting service implementation extensions because the "reasons provided by the applicant were situations that were in their control and therefore cannot be considered as valid reasons for delay."⁸ El Monte believes that USAC misapplied the Commission's rule governing service implementation extensions. Specifically, section 54.507(d)(4)(iii) of the Commission's rules provides that an applicant may obtain an implementation extension from USAC if "[t]he applicant's service provider is unable to complete implementation for reasons beyond the *service provider's* control."⁹ In this case, as we have explained, the reason for delay was the technology director's untimely death and the applicant's subsequent staffing challenges and was indeed completely beyond the service provider's control. Accordingly, El Monte's extension request did satisfy section 54.507(d)(4)(iii) and should have been granted.

In its decision, USAC cited the Commission's 2001 order adopting section 54.507(d)(4)(iii) for the proposition that the delay must be for reasons beyond the *applicant's*

⁶ USAC Denial at 2.

⁷ 47 C.F.R. § 54.719(b), (c); 47 C.F.R. § 54.722(a).

⁸ USAC Denial at 2.

⁹ 47 C.F.R. § 54.507(d)(4)(iii) (emphasis added).

control.¹⁰ Notably, USAC did not cite the rule itself, which explicitly limits extensions to delays caused by reasons beyond the *service provider's* control. Instead, USAC quoted the following language from the Commission's 2001 order: "[W]e recognize that there may be a wide range of situations under criteria (3) in which an applicant through no fault of its own is unable to complete installation by the applicant's original September 30 implementation deadline."¹¹ El Monte respectfully suggests that USAC cherry-picked this language to support its denial, because not only does the rule itself by its own terms apply only to reasons beyond the *service provider's* control, but the 2001 order also makes it clear that the Commission intended the rule to be limited to service providers. Elsewhere in the order, when referencing the rule in question, the Commission consistently refers to the service provider's control, not the applicant's control.¹²

In short, neither the rule in question nor the Commission order adopting that rule states that the reasons for delay must be beyond the *applicant's* control as well as the service provider's control, and El Monte is aware of no Commission order interpreting the rule in that manner. There is one Bureau order that may implicitly suggest that the cause of the delay must be beyond

¹⁰ USAC Denial at 2.

¹¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 01-195, ¶ 16 (2001).

¹² See, e.g., *id.* ¶ 12 (authorizing extensions for "applicants whose service providers are unable to complete implementation for reasons beyond the service provider's control"); *id.* ¶ 16 ("Circumstances beyond the service provider's control may include manufacturing delays and natural disasters."). Subsequent Bureau orders and public notices routinely describe the rule as allowing extensions for delays that are "beyond the service provider's control." See, e.g., Request for Waiver of Section 54.507(d) of the Commission's Rules by Harvest Preparatory School, CC Docket No. 02-6, Order, DA 10-886, ¶ 2 (WCB 2010); *Streamlined Resolution of Requests Related to Actions by the Universal Service Administrative Company*, CC Docket No. 02-6, WC Docket Nos. 02-60, 06-122, Public Notice, DA 16-472 (WCB, rel. Apr. 29, 2016).

the applicant’s control as well as the service provider’s.¹³ However, El Monte knows of no Commission-level order interpreting the rule this way. And the Bureau’s *Accelerated Charter Order* does not purport to clarify or interpret the rule to include applicants – even though the rule specifically states service providers – and instead denies the appeal in one sentence.¹⁴ In fact, elsewhere in the *Accelerated Charter Order*, the Bureau granted two other service implementation extension requests after finding that those applicants had been “unable to complete implementation on time for reasons beyond the *service providers’* control.”¹⁵

In the wake of the *Accelerated Charter Order*, the Bureau has granted at least two appeals where the applicants cited their own staffing and management problems.¹⁶ It also has denied some appeals in which the failure to meet the service implementation *deadline* was due to staffing and management challenges faced by the applicants.¹⁷ Because these decisions contain

¹³ See *Requests for Review/Waiver of the Decision of the Universal Service Administrator by Accelerated Charter et al.*, CC Docket No. 06-2, Order, DA 14-1607, ¶ 3 & n.8 (WCB, TAPD 2014) (*Accelerated Charter Order*).

¹⁴ *Id.*

¹⁵ *Id.* ¶ 2 (emphasis added). In subsequent denials of service implementation extension requests, the Bureau has consistently described the *Accelerated Charter Order* as having denied “late-filed extensions of the deadline for service implementation when applicants failed to demonstrate they were unable to complete implementation on time for reasons beyond the *service providers’* control.” See, e.g., *Streamlined Resolution of Requests Related to Actions by the Universal Service Administrative Company*, CC Docket No. 02-6, WC Docket No. 06-122, Public Notice, DA 15-1494 (WCB 2015) (emphasis added).

¹⁶ See *Streamlined Resolution of Requests Related to Actions by the Universal Service Administrative Company*, CC Docket No. 02-6, WC Docket Nos. 02-60, 06-122, Public Notice, DA 16-472 (WCB, rel. Apr. 29, 2016) (granting the Ch’ooshgai Community School’s appeal); *Streamlined Resolution of Requests Related to Actions by the Universal Service Administrative Company*, CC Docket No. 02-6, WC Docket Nos. 02-60, 06-122, Public Notice, DA 15-505 (WCB, rel. Apr. 29, 2015) (granting the Harlandale Independent School District’s appeal of a late-filed service implementation extension denial).

¹⁷ See *Accelerated Charter Order*, ¶ 3 & n.8; *Streamlined Resolution of Requests Related to Actions by the Universal Service Administrative Company*, CC Docket No. 02-6, WC Docket Nos. 02-60, 06-122, Public Notice, DA 16-988 (WCB, rel. Aug 29, 2016) (denying the Greenbrier County School District’s appeal).

little discussion, it is unclear why the Bureau granted some and denied others. For present purposes, though, El Monte simply urges the Bureau to consider the extraordinary challenge it faced – the unexpected death of its technology director, which would be difficult for any school district to overcome – as well as that fact that El Monte acted in good faith at all times and submitted its extension request on time. In these respects, El Monte’s appeal is at least as deserving of a grant as Harlandale’s was.¹⁸

III. IN THE ALTERNATIVE, A WAIVER OF THE COMMISSION’S RULE IS IN THE PUBLIC INTEREST

As we have explained, El Monte’s extension request satisfied the criteria in the Commission’s rules and should have been granted. However, El Monte respectfully requests in the alternative that the Bureau waive section 54.507(d) to the extent that the Bureau finds it necessary to grant the requested relief.¹⁹

¹⁸ See Harlandale Independent School District, Application No. 679511, Request for Review, CC Docket No. 02-6 (filed Oct. 17, 2014) (describing the school district management problems that caused the missed deadline, and making it clear that the circumstances of the delay were outside the service provider’s control, but within the applicant’s control).

¹⁹ El Monte also requests that the Bureau waive other rules, as necessary, to effectuate this relief, such as, for example, the invoice deadline.

Any of the Commission's rules may be waived if good cause is shown.²⁰ The Commission may exercise its discretion to waive a rule where the particular facts make strict compliance inconsistent with the public interest.²¹ In addition, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.²² The Bureau has waived section 54.507(d) where it has found that the applicants "attempted in good faith to comply in a timely manner in seeking an extension of the deadline."²³

El Monte respectfully argues that a waiver of section 54.507(d) would be in the public interest. El Monte does not know why USAC denied its latest extension request after having previously granted extension requests for the same funding year with no suggestion that El Monte did not satisfy the criteria in the Commission's rules and when the facts in El Monte's situation were the same. USAC's unexplained reversal came at a time when El Monte had secured the staffing and the funding that would allow its service provider to complete the authorized work. It is El Monte's understanding that USAC typically allows applicants to continue moving forward to complete their projects when they are in good faith working hard to do so. The Bureau took the same approach in the *Accelerated Charter Order*, granting the petitioners' appeals when they "made significant efforts to secure the necessary extensions" even though they filed their extensions late.²⁴ Here, El Monte has filed each extension on time and is making significant efforts to complete its installation. El Monte and Alquest still wish to

²⁰ 47 C.F.R. § 1.3.

²¹ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (Northeast Cellular).

²² *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

²³ *Requests for Review of the Decision of the Universal Service Administrator by Lancaster School District*, CC Docket No. 02-6, Order, DA 11-741, ¶ 3 (WCB, TAPD 2011).

²⁴ *Accelerate Charter Order*, ¶ 2.

complete the installation under the terms of their original contract, have already made great progress toward completion of the work, and are poised to complete it within the next year. El Monte believes that denying E-rate funding under these circumstances would be unjust, and that waiving the rule to the extent necessary would be consistent with the public interest.

A waiver of section 54.507(d) would also constitute a more effective implementation of overall policy. Both El Monte and Alquest believe that completing the work pursuant to their original agreement is the most efficient and cost-effective use of the school district's resources. In particular, El Monte hopes not to have to rebid the project, which would divert resources away from the schools' other needs. El Monte believes that the purposes of the E-rate program would be better served if it is permitted to use the funds it was previously committed to implement the internal connections work that its director of information services has identified as necessary to enable modern communications capacity in El Monte schools. This work includes installing and upgrading its internal connections to support 10GB Ethernet upgrades around the school district, and upgrading the ends of existing fiber optic cables, as the older style is becoming brittle and breaking. El Monte also has numerous classrooms in which the wrong type of cable was installed at some point, and networking capability has failed as a result. Allowing El Monte to use the committed funds to complete this important work with its trusted service provider, rather than forcing El Monte to go through the time and expense of rebidding the work, would be in the public interest and would further the overall goals of the E-rate program.

IV. CONCLUSION

For the foregoing reasons, the Bureau should grant El Monte's request for appeal, or, in the alternative, its request for waiver. The Bureau should also grant a waiver of any other rules, such as the invoicing deadline rules, necessary to effectuate a grant of this appeal.

Respectfully submitted,

/s/ Gina Spade

Gina Spade
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Washington, DC
DC Bar # 452207
gina@broadbandlegal.com
202-907-6252

October 31, 2016

CERTIFICATE OF SERVICE

This is to certify that on this 31st day of October, a true and correct copy of the foregoing
Request for Review was sent via email to:

SLD, Universal Service Administrative Company, Appeals@sl.universalservice.org

/s/ Gina Spade

Affidavit of Erick Steelman

I, Erick Steelman, swear:

1. That I am director of information services of the El Monte Union High School District.

I was hired by the district for that position in August 2014.

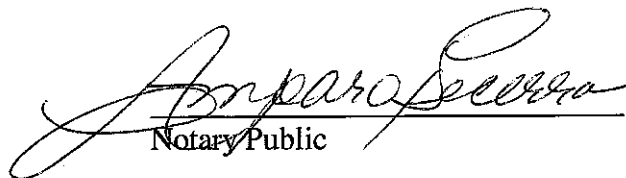
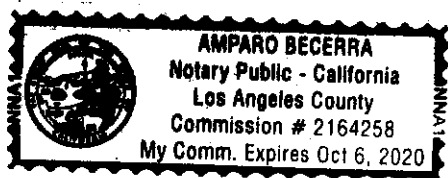
2. That I have read the foregoing appeal and avow the information stated therein is true and correct to the best of my knowledge and belief.



Erick Steelman
Director of Information Services
El Monte Union High School District
3537 Johnson Avenue
El Monte, CA 91731

Subscribed and sworn to before me this 31st day of October, 2016.

[Seal]


Notary Public

CALIFORNIA JURAT WITH AFFIANT STATEMENT**GOVERNMENT CODE § 8202**☒ See Attached Document (Notary to cross out lines 1-6 below)☐ See Statement Below (Lines 1-6 to be completed only by document signer[s], not Notary)

1 _____
2 _____
3 _____
4 _____
5 _____
6 _____

Signature of Document Signer No. 1

Signature of Document Signer No. 2 (if any)

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of LOS ANGELES

Subscribed and sworn to (or affirmed) before me

on this 31st day of October, 20 16by ERICK W. STEELMAN

(1) _____

(and (2) _____),

Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature Amparo Becerra

Signature of Notary Public



Seal

Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached DocumentTitle or Type of Document: Affidavit Document Date: OCT 31, 16Number of Pages: 2 Signer(s) Other Than Named Above: None

Exhibit 1
USAC's Appeal Denial Letter



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2011-2012

September 01, 2016

Russ Reshaw
eDimension, LLC
40335 Winchester Rd., Ste E522
Temecula, CA 92591

Re: Applicant Name: EL MONTE UNION HIGH SCH DIST
Billed Entity Number: 143586
Form 471 Application Number: 819756
Funding Request Number(s): 2232618
Your Correspondence Dated: September 26, 2015

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Funding Year 2011 Administrator's Decision on Implementation Extension Request Letter for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision. If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 2232618
Decision on Appeal: **Partially Approved**
Explanation:

- Based on your appeal letter and the relevant documentation, we find that your Service Implementation Request was submitted prior to the September 30, 2015 deadline. However, we are unable to approve the extension for the following reason:

FCC Rules related to the payment of support for discounted services establish deadlines for service providers to deliver services/products to the applicant. The FCC provides an extension of this deadline under certain conditions. Those conditions are documented in the Reference area on the USAC website and in FCC Report and Order (FCC 01-195) released on June 29, 2001. Per FCC 01-195, the FCC states, "we recognize that there may be a wide range of situations under criteria (3) in which an applicant through no fault of its own is unable to

complete installation by the applicant's original September 30 implementation deadline." The reasons provided by the applicant were situations that were in their control and therefore cannot be considered as valid reasons for delay. Therefore, the appeal is partially approved.

Since your appeal was partially approved, you may file an appeal with the FCC. Your appeal must be postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found under the Reference Area/"Appeals" of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division
Universal Service Administrative Company

Exhibit 2

Administrator's Decision on Implementation Extension Request

Administrator's Decision on Implementation Extension Request

March 31st, 2016

Russ Reshaw
E Dimension Consulting
40335 Winchester Rd, Ste E522
Temecula, CA 92504

RE: EL MONTE UNION HIGH SCH DIST

FCC Form 471 Application 819756
Number:
Funding Request Number(s): 2232618

Your Correspondence Dated: October 2, 2015

After thorough review and investigation of all relevant facts, the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company ("USAC") has made its decision in regard to your implementation extension request. This letter explains the basis of USAC's decision. The date of this letter begins the 60-day time period for appealing this decision. If your request included more than one FRN, please note that for each FRN you may receive a separate determination letter.

Decision on Request: **Denied in full**

Request received after the FCC deadline for Implementation Deadline Extension requests which was 9/30/2015.

In accordance with the FCC Report and Order (FCC 01-195) released on June 29, 2001, the Administrator may grant an extension of time for the implementation of non-recurring services if the implementation is delayed for circumstances beyond the named service provider's control. You have been unable to establish such circumstances.

TO APPEAL THIS DECISION

If you wish to appeal a decision in this letter to USAC, your appeal must be received by USAC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and email address for the person who can most readily discuss this appeal with us.

2. State outright that your letter is an appeal. Include the following to identify the USAC decision letter (e.g., FCDL) and the decision you are appealing:
 - appellant name
 - applicant and service provider names, if different than appellant
 - applicant BEN and service provider SPIN
 - **<insert application or form number>** as assigned by USAC
 - Funding Request Number(s) (FRNs) you are appealing if provided in the letter
 - **<insert name of the letter and funding year - both are located at the top of the letter>** AND
 - the exact text or the decision that you are appealing.
3. Please keep your letter to the point and provide documentation to support your appeal. Be sure to keep a copy of your entire appeal, including any correspondence and documentation.
4. If you are the applicant, please provide a copy of your appeal to the service provider(s) affected by USAC's decision. If you are the service provider, please provide a copy of your appeal to the applicant(s) affected by USAC's decision.
5. Provide an authorized signature on your letter of appeal.

We strongly recommend that you use one of the electronic filing options. To submit your appeal to USAC by email, email your appeal to appeals@sl.universalservice.org or submit your appeal electronically by using the "Submit a Question" feature on the USAC website. USAC will automatically reply to incoming emails to confirm receipt.

To submit your appeal to us by fax, fax your appeal to (973) 599-6542.

To submit your appeal to us on paper, send your appeal to:

Letter of Appeal
Schools and Libraries Division - Correspondence Unit
30 Lanidex Plaza West
PO Box 685
Parsippany, NJ 07054-0685

For more information on submitting an appeal to USAC, please see "Appeals" in the "Schools and Libraries" section of the USAC website.

Schools and Libraries Division
Universal Service Administrative Company

cc: Rebecca A Morales, Alquest Technologies, Inc.